

Exhibit E

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Petition of New York Telephone Company for Approval)	
of Its Statement of Generally Available Terms and)	
Conditions Pursuant to Section 252 of the)	
Telecommunications Act of 1996 and Draft Filing of)	Case 97-C-0271
Petition for InterLATA Entry Pursuant to Section 271)	
of the Telecommunications Act of 1996 to Provide)	
In-Region, InterLATA Services in the State of New York)	

AFFIDAVIT OF ALAN THOMPSON

I, Alan Thompson, first being duly sworn, depose and state as follows:

1. I am Implementation Project Manager for RCN Telecom Services and other RCN affiliates ("RCN"). My office is at 105 Carnegie Center, Princeton, New Jersey, 08540. At RCN, my responsibilities include implementation of access to unbundled network elements, as well as general interconnection issues.

2. I joined RCN in April of 1997. Before coming to RCN, I worked for New York Telephone Company (now known as Bell Atlantic-New York ("BA-NY")) for twenty-six years. I worked in the following areas: POTS installation and repair, POTS and coin line testing, private line design, the divestiture task force, and IXC private line provisioning. I have extensive experience, on the side of the incumbent, in working with new entrants. I worked on a team specializing in POT bay inventory, and I was a part of a wholesale markets team for unbundled network element provisioning support. I implemented access to unbundled network elements for Teleport, MFS, Brooks Fiber, Frontier Communications, and AT&T. At RCN, I have worked to implement access to unbundled network elements and RCN's interconnection with BA-NY's house and riser cable. In short, I have considerable experience with interconnection issues.

3. I obtained my A.A.S degree in biological technology from New York State University at Farmingdale, New York in 1965. I attended Centenary College from 1965 to 1967, when I was drafted into the United States Navy. In the Navy, I received technical training in advanced electricity and electronics as well as the training of a sonar technician. Before I left the Navy in 1971, I served as a nuclear weapons handler, with a top secret clearance, on a team that deployed Anti-Submarine Rockets.

4. I am submitting this affidavit on behalf of RCN to respond to the "Joint Supplemental Affidavit of Donald E. Albert, Julie A. Canny, George S. Dowell, Karen Maguire and Patrick J. Stevens" submitted on April 13, 1999, by BA-NY ("BA-NY Affidavit"). Some statements in the BA-NY Affidavit, in particular those statements regarding house and riser cable and link/transport combinations, do not provide the full picture regarding BA-NY's performance in facilitating competition in the local markets of New York.

Problems with Provisioning House and Riser Cable

5. RCN is a facilities-based carrier serving mostly residential customers in New York City. RCN has sought to connect its link plant to the BA-NY house and riser cable that services individual customers in multi-dwelling units. BA-NY offers access to its house and riser facilities to CLECs pursuant to its NY PSC No. 916 Tariff. BA-NY Affidavit, ¶ 115.

6. The process for provisioning house and riser cable set forth in BA-NY's tariff is ineffective, uncertain and has acted as a barrier to entry for RCN. Until recently, BA-NY did not have a mechanized process in place to accept and provision orders for house and riser cross-connects. BA-NY claims that it now provides for mechanized ordering through the GUI,

however, that claim is open to dispute. Nevertheless, even if BA-NY had a mechanized ordering process, it would provide little relief because each order still requires BA-NY to dispatch a technician into the field to perform the cross-connect work.¹ BA-NY's technicians act as a bottleneck because they can handle only so many orders themselves, and BA-NY currently forbids RCN from using its own technicians to perform cross-connect work.

7. In its Phase 2 Opinion,² the Commission deferred a decision on the issue of whether to allow CLEC technicians to perform their own house and riser cross-connects until BA-NY and Teleport completed a trial (in which Teleport was supposed to be able to do its own cross-connect work). Because this issue is vitally important to RCN, it requested permission from BA-NY to participate in the trial. However, BA-NY summarily denied this request and RCN has had to rely on BA-NY technicians to perform house and riser cross-connect work for RCN customers.

8. Allowing only BA-NY technicians to place house and riser cross-connects is inefficient and ultimately detrimental to New York consumers because it puts CLECs at the mercy of the BA-NY scheduling constraints and labor allocation. Although BA-NY currently has allocated adequate labor resources to house and riser cross-connects — which is not surprising because BA-NY has an incentive to do so given that its Section 271 application is pending — competitors cannot expect to receive this kind of attention to house and riser issues

¹ RCN obtains access to BA-NY's house and riser cable through a cross-connect placed between RCN's link plant and BA-NY's house and riser.

² *Opinion and Order in Phase 2*, Cases 95-C-0657, 94-C-0095, 91-C-1174, December 22, 1997, at 71.

from BA-NY indefinitely. Whenever BA-NY receives Section 271 approval, it is less likely to be willing to devote the same exceptional number of technicians to CLECs' house and riser cross-connects needs. Neither BA-NY's Pre-Filing Statement nor the Carrier-to-Carrier Service Standards provide any protection for CLECs should BA-NY backslide in provisioning house and riser cross-connects. In addition, the demand for house and riser cross-connects is only going to grow in the future as facilities-based competition increases.

9. There is no reason not to allow CLECs to place their own cross-connects to BA-NY's house and riser cable. It is a simple operation and does not pose a threat to the integrity or safety of BA-NY's telephone network. BA-NY has claimed in discussions with RCN and Commission staff that it would experience problems with its union if it allows CLEC technicians to place their own cross-connects to BA-NY's house and riser cable. However, RCN technicians routinely work in the same buildings (and generally the same rooms) as BA-NY technicians without incident. Moreover, to the extent that BA-NY's collective bargaining agreement with the union forbids it from allowing other carriers to work on its plant, BA-NY should not be able to make sweetheart deals that stifle competition and present barriers to entry for CLECs in New York.

10. In addition, BA-NY has not established the proper methods and procedures for provisioning house and riser cable. In a recent grouping of fourteen house and riser dispatches, BA-NY technicians performed only two correctly. It appears that when BA-NY gives its technicians their orders, BA-NY identifies the circuits but does not inform the technicians that they must perform cross-connects. Therefore, BA-NY technicians do not know what to do once

they are at house and riser cable terminal block and simply close the orders without performing the necessary cross-connect.

11. Recently, a BA-NY technician called to inform us that a trouble ticket we had submitted had no cable and pair and that he could not accept the trouble. I explained the house and riser process to him and his response was "Who thought this up?" After I explained that it was a tariffed service, he said *"This ought to be something, trying to get a dispatch on this."* His reactions effectively demonstrate the problems that RCN and other CLECs face when they rely on BA-NY technicians to perform their cross-connects. BA-NY forces RCN to use BA-NY technicians for house and riser cross-connects, yet apparently has not established the proper methods and procedures necessary to instruct the technicians how to complete the task properly.

12. Prohibiting CLECs from performing house and riser cross-connect work puts RCN and other CLECs in the precarious position of relying on BA-NY to allocate sufficient labor resource to meet increasing demand levels. As I stated above, cross-connecting CLEC link plants with BA-NY house and riser cable is a simple operation in which there is little risk of CLEC technicians interfering with the integrity and safety of BA-NY's telephone network. If CLECs could perform their own cross-connects with BA-NY's house and riser cable, they could schedule the necessary operations and allocate resources according to their own specific needs, instead of relying upon BA-NY. Allowing CLEC technicians to place their own cross-connects would greatly increase efficiency, improve service to consumers and speed the development of local (and, in RCN's case, residential) competition in New York.

Problems with Provisioning Link/Transport Combinations

13. RCN uses unbundled network elements to bring some buildings in New York City onto RCN's local service network. RCN has experienced problems ordering link/transport combinations using BA-NY Tariff No. 914. BA-NY tariffed network element combinations in 1996 and, in the Pre-Filing Statement, committed to making those combinations available until it makes certain showings regarding the ability of CLECs to combine network elements themselves. Since BA-NY has not made such showings, it is obligated to continue to offer combinations of network elements under Tariff No. 914.

14. BA-NY has failed to establish the proper methods and procedures for provisioning link/transport combinations under Tariff No. 914 and the process is haphazard and frustratingly prone to error and delay. The link/transport combinations RCN currently uses are very similar to the BA-NY's expanded extended link ("EEL"), which contains the same elements. I have not received any information concerning the methods and procedures for EEL provisioning, but if BA-NY's provisioning process for the EEL is anything like its current laborious process for provisioning link/transport combinations, it will be difficult for CLECs to use the EEL to provide reliable, efficient competitive local telephone service.

15. To start with, BA-NY requires CLECs to place multiple orders to complete one circuit. Most often, RCN must submit two Access Service Requests ("ASRs") for one T1 line. RCN must place one ASR for the transport portion of the circuit and a second order for the unbundled link. Despite the fact that RCN issues each of these orders with a related purchase order number and the same due date, BA-NY does not treat these orders as related.

16. Frequently, the link is ready for testing before BA-NY completes the transport. However, RCN cannot accept the link without being able to test through the yet-to-be-completed transport portion of the circuit. Therefore, BA-NY puts the link order in customer not ready ("CNR") status and asks RCN for a supplemental application to push back the due date six days. In addition, because BA-NY frequently misses the firm order commitment date for the transport portion of the circuit, RCN cannot usually issue a supplemental application to try to coordinate the due dates for both portions.³

17. If BA-NY completes the transport portion before the link portion, it loops back the circuit (by using a looping plug) in order to keep its equipment from being in alarm. When BA-NY completes the link and calls RCN to test it, RCN again is unable to accept the link because the looping plug prevents it from seeing through the transport portion of the circuit. BA-NY again places the circuit in CNR status and asks RCN to submit a supplemental application for another six-day interval. Since the transport portion is a completed order at this point, RCN must call in a trouble ticket to address the problem. Usually, the maintenance center will not pull the looping plug because it will put BA-NY's equipment into alarm, thus making link testing impossible on the new due date. As with the initial installation process, the maintenance center also sees the circuit as being two separate circuits and will not coordinate the trouble. This cycle goes on and on, wasting resources and delaying implementation of customer service.⁴

³ BA-NY usually does not issue a new Firm Order Commitment date or even give RCN a verbal commitment.

⁴ BA-NY claims in its Affidavit that CLECs are responsible for many of the problems associated with provisioning unbundled interoffice transport because the CLECs

18. BA-NY's record of provisioning loop/transport combinations under Tariff No. 914 is deplorable. Of two hundred forty seven loop/transport combination orders RCN submitted to BA-NY, approximately fifty-two were completed by BA-NY on the due date RCN requested. Of the same two hundred forty seven orders, BA-NY completed only ninety by their BA-NY Firm Order Commitment dates. Moreover, although BA-NY's stated provisioning interval is fifteen days, listed below is BA-NY's actual provisioning record.

Quantity of orders complete within interval	- 9
Quantity complete within 30 calendar days	- 90
Quantity complete between 31 - 35 days	- 28
Quantity complete between 36 - 40 days	- 36
Quantity complete between 41 - 45 days	- 20
Quantity complete between 46 - 50 days	- 12
Quantity complete between 51 - 70 days	- 30
Quantity complete between 71 - 90 days	- 8
Quantity over 90 days	- 14

19. It is my personal belief that BA-NY is purposely making the provisioning process for link/transport combinations incredibly difficult as a way to force carrier like RCN to stop ordering network element combinations out of Tariff No. 914, which it has sought to withdraw for some time now.

frequently are not ready to accept such facilities when BA-NY is ready to deliver them. BA-NY Affidavit, ¶ 218. However, in cases such as that described above, it is hardly RCN's fault that it cannot always accept the unbundled transport when BA-NY is ready to turn the facilities up. BA-NY simply uses "Customer Not Ready" as a convenient label to conceal its own operational errors.


20. I know that BA-NY is likely to receive permission to grandfather these tariff provisions in the future (when it makes the showings required by the Pre-Filing Statement and Case 98-C-0690). However, at that point, RCN may have spare capacity in the transport component of the combinations that it has purchased. Therefore, when BA-NY grandfathers this tariff, it must permit RCN to use this capacity efficiently by purchasing new links or, at the very least, converting these arrangements to the EEL. If BA-NY chooses to convert RCN's link/transport combinations to the EEL, the conversion must be seamless, without any customer service interruption whatsoever (*i.e.*, BA-NY must allow RCN to use exactly the same facilities).

The foregoing statements are true and correct to the best of my knowledge, information and belief.


Alan Thompson

State of New Jersey)
): SS
County of Mercer)

Subscribed and sworn to before me this 24 day of April, 1999.


Notary Public

My Commission expires:

July 10, 2002

Leslie C. McCullough
Notary Public of New Jersey
My Commission Expires July 10, 2002

Exhibit F

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Petition of New York Telephone Company for Approval)	
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In-Region, InterLATA Services in the State of New York)	

AFFIDAVIT OF TIMOTHY WYLLIE

I, Timothy Wyllie, first being duly sworn, depose and state as follows:

1. I am Senior Vice President of Construction for RCN Telecom Services and other RCN affiliates ("RCN"). My office is at 105 Carnegie Center, Princeton, New Jersey, 08540. My responsibilities include overseeing both aerial and underground construction for RCN and its affiliates. As a result, I have considerable experience dealing with issues related to access to poles, ducts, conduits and rights-of-way.

2. I am submitting this affidavit on behalf of RCN to respond to the "Joint Supplemental Affidavit of Donald E. Albert, Julie A. Canny, George S. Dowell, Karen Maguire and Patrick J. Stevens" submitted on April 13, 1999, by BA-NY ("BA-NY Affidavit"). Some statements in the BA-NY Affidavit, in particular those statements regarding nondiscriminatory access to poles, ducts, conduits and rights-of-way, do not provide the full picture regarding BA-NY's performance in facilitating competition in the local markets of New York.

Problems with Pole Attachments

3. RCN is a facilities-based carrier serving mostly residential customers in New York City. RCN is in the process of building its own network in New York City and is concerned that BA-NY will not be able to provide pole attachments to CLECs such as RCN on a

timely basis, thereby hampering RCN's ability to provide competitive telecommunications services. BA-NY states in its affidavit that during 1998 it only received 31 applications from CLECs for 1,701 poles, 19 of which required make-ready work. BA-NY Affidavit ¶ 123.

However, RCN, as it establishes its New York network, anticipates applying for pole attachments for 15,000 to 20,000 poles in an individual construction area within the next year alone, most of which, if not all, will require make-ready work. Moreover, RCN expects that its applications for pole attachments will reach even higher levels by 2000 and 2001.

4. RCN is hardly comforted by BA-NY's boast that it has increased its construction workforce by more than 19% since 1996 and its claim that it could still meet the demand for access to poles even if the make-ready work were to double on a year-to-year basis. BA-NY Affidavit ¶ 126. As stated above, RCN plans to apply for access to 15,000 to 20,000 poles this year alone, a nearly tenfold increase from the 1998 level. In addition, the demand for pole attachments will only increase as other CLECs begin establishing their networks. BA-NY has provided little proof that it would be able to meet such a demand for pole attachments in a timely manner. Moreover, the problem of pole-attachment delay is compounded by the fact that BA-NY requires attaching parties, such as RCN, to pay in advance for make-ready work. Therefore, while the long make-ready lead time causes unreasonable delay, it also ties up competitors' capital. The possibility of serious delays in the make-ready process is a significant threat to RCN's ability to establish a competitive telecommunications network.

5. BA-NY's claims that its performance has been better than the standard intervals in its licence agreements are of little help in evaluating their current performance, let alone

evaluating their ability to handle a tenfold increase in the demand for pole attachments. BA-NY Affidavit ¶ 125. BA-NY's pole attachment license agreements include standard intervals for the make-ready work portion alone of 60 or 90 days, depending on the nature and complexity of the project. *Id.* BA-NY states that its average interval for completion of make-ready work was 78 days. If BA-NY has provided a statewide average, as it appears to have had, it may be merely disguising its poor performance in meeting its make-ready intervals in urban areas by blending the figures for urban applications with the results for more rural areas, where there is frequently no conflict in the communications space. To be fair and accurate a disaggregation study should be conducted to accurately identify BA-NY's performance in major market areas.

6. Finally, BA-NY's claim that it has provided the same level of service to CLECs for pole attachments as it provides itself does not give the full picture. BA-NY Affidavit ¶ 130. BA-NY already has a large embedded network and when it performs work for itself it is usually performing upgrades or maintenance of its already established systems and services. In contrast, RCN is in the process of *building* its own network. The work BA-NY performs for RCN is much more critical to RCN's ability to provide service than is the work that BA-NY performs for itself. Therefore, the consequences of lengthy delays in performing make-ready work are much more harmful to RCN than they are to BA-NY. BA-NY's claim that it provides the same level of service to CLECs as to itself does not address the fact that RCN is more seriously harmed by substandard performance than is BA-NY. The bar must be raised to meet pole attachment demands in a competitive market.

Problems with Excavation and Access to Conduits

7. RCN has found problems with excavation and access to conduits to be a particularly substantial roadblock to providing competitive telecommunications services in New York, especially in Manhattan. Carriers like RCN that are building their own network require access to BA-NY's conduit space to install interoffice transport and loop plant. RCN has suffered from lengthy delays in placing new conduit in New York City or in accessing existing conduit. BA-NY's wholly-owned subsidiary Empire City Subway ("ECS") administers excavations for new conduit in Manhattan. The process of obtaining such conduit from ECS has taken an average of one hundred and thirty three days per excavation request. Although BA-NY performs excavations through its subsidiary ECS (over which the Commission does not have direct jurisdiction), the Commission nevertheless can and should condition BA-NY's Section 271 approval upon its willingness to address the issues concerning excavations.

8. As an example of the delays experienced by RCN, I have described below the history of an ESC order associated with construction on 57th Street submitted by RCN in Spring 1998.

1 st Update	Start:	January 4, 1999
	Anticipated Completion:	January 31, 1999
2 nd Update	Notice Date of Extension:	January 29, 1999
	Anticipated Completion:	February 18, 1999
3 rd Update	Notice Date of Extension:	February 18, 1999
	Anticipated Completion:	March 11, 1999
4 th Update	Notice Date of Extension:	March 10, 1999
	Anticipated Completion:	May, 15, 1999

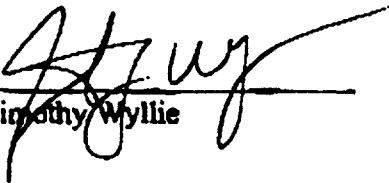
9. Although RCN has experienced some improvement in communication with ECS recently, it is important to note that RCN is building its network from scratch and as a new competitor in New York City, it imperative for its survival to maintain an acceptable level of speed to market. Delayed construction of our network is and will remain a roadblock to providing competitive telecommunications services in New York.

10. BA-NY states in its affidavit that RCN is free to seek municipal authorization for the placement of conduit within New York City. BA-NY Affidavit ¶ 140. However, RCN is not seeking a franchise similar to that of ECS, RCN merely wishes to avoid the delays associated with relying upon ECS for placement of conduit, by performing the necessary excavation work for new conduit themselves (using ECS approved contractors), under the umbrella of ECS. This is necessary because RCN is prohibited from constructing mainline conduit in New York City if it bypasses ECS manholes. RCN may build mainline conduit in areas not currently served by ECS, but may not loop in and out of their system. The lengthy delays and other difficulties associated with excavation by ECS are having a negative impact on both the roll out of the RCN network and the service performance associated with timely operations. Forcing RCN to rely on ECS internal crews to perform excavations hobbles RCN's ability to provide competitive service in New York.

11. BA-NY also states that it is not receiving preferential treatment from ECS. BA-NY Affidavit ¶ 142. However, as I stated above, any delays associated with excavation and access to conduits are more harmful to RCN than to BA-NY. BA-NY has already has a large embedded network, and its ability to provide service is not critically affected by difficulties with

ECS. RCN, on the other hand, is in the process of building its network in New York City and any delays or other obstacles created by ECS significantly impair its ability to provide quality competitive service to its customers.

The foregoing statements are true and correct to the best of my knowledge, information and belief.


Timothy Wyllie

State of New Jersey)
): SS
County of Mercer)

Subscribed and sworn to before me this ____ day of April, 1999.

Notary Public

My Commission expires:

Affidavit of Timothy Wyllie
Case 97-C-0271

Exhibit G

PUBLIC SERVICE COMMISSION

Petition of New York Telephone Company for Approval)
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of the Telecommunications Act of 1996 to Provide)
In-Region, InterLATA Services in the State of New York)

AFFIDAVIT OF TERRY ROBERTS

I, Terry Roberts, first being duly sworn, depose and state as follows:

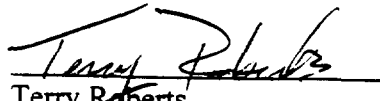
1. I am employed by RCN Telecom Services of New York, Inc. ("RCN") as the Director of Network Operations.
2. I am submitting this affidavit on behalf of RCN to bring to the Commission's attention the various instances in which Bell Atlantic-New York ("BA-NY") has caused RCN's customers, served over unbundled local transport, to be without service for extended periods of time.
3. As the Commission is aware, RCN is a facilities-based carrier serving mostly residential customers in New York City. While RCN serves most customers almost entirely over its own network, it does purchase unbundled local transport from BA-NY and use those facilities to connect various outlying customers to its switch. Recently, there have been a number of service outages with these unbundled local transport arrangements. Unfortunately, BA-NY has not addressed the trouble tickets that RCN filed with regard thereto in a responsive and timely manner.
4. First, BA-NY has not responded to RCN's trouble tickets regarding out of service unbundled local transport in a timely manner. On many occasions, RCN customers have experienced loss of service, including 911 service, for twelve to twenty-four hour periods —

although in some cases the outages have been even longer. The cause of these outages appears to be BA-NY's failure to dispatch a technician within a reasonable interval. At other times, it appears that BA-NY dispatches a technician, but that individual closes the trouble ticket without actually restoring the customer's service. In such cases, the RCN customer goes without service for extended periods of time while RCN generates a new trouble ticket.

5. Although Appendix A (attached hereto) provides a record of the trouble tickets generated for RCN customers who have experienced extended service outages, RCN lacks complete records. BA-NY arbitrarily cancels tickets or reissues new tickets without providing RCN with any notice. As a result, the data in Appendix A may not properly reflect the time a particular repair may take.

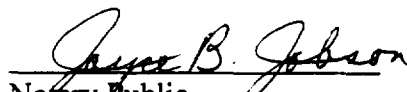
6. BA-NY's failure to address and resolve trouble tickets in a timely manner gives RCN's customers a poor impression of its service quality. Consequently, RCN loses existing and potential customers due to circumstances that are wholly within the control of BA-NY.

The foregoing statements are true and correct to the best of my knowledge, information and belief.

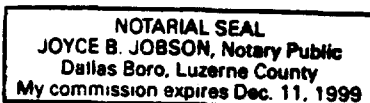

Terry Roberts

State of PENNSYLVANIA)
County of LUZERNE) : SS

Subscribed and sworn to before me this 5TH day of August, 1999.


Notary Public

My Commission expires: 12-11-99



APPENDIX A

Table of Service Outages Lasting Twenty Four Hours or More

	RCN TK	Bell TK	New Bell TK	DAYS TK WAS OPENED UNTIL RCN CLOSED TK
1	70614	TR095979		1
2	70650	ML169537		1
3	70654	MH186778		1
4	70700	HC047728		3
5	70717	TR100228		1
6	70800	HC050545	HC050630	2
7	70813	ML197849		1
8	70819	HC051149		1
9		HC051150		1
10	70820	HC051251		3
11	70821	HC051262		12
12	70842	HC051693		2
13		HC051694		2
14	70846	MH229232		1
15	70847	MH229234	MH229269	1
16	70852	HC052127		1
17	70853	HC052125		1
18	70855	HC052142		1
19	70856	HC052159		1
20	70857	HC052161		1
21	70859	GM075264		13
22	70862	HC052514		3
23	70864	HC052554		2
24		HC052555		1
25	70868	HC052589		1
26	70878	TR103947		7
27	70883	TS001791		5
28		TS001792		5
29	70887	ML209610		1
30		ML209611		1
31		ML209613		1
32	70892	TR104222		2
33	70893	HC053217	HC053346	2
34	70900	HC053431		2
35		HC053432		2
36	70907	GM078622	GM078902	4
37	70908	GM078650		1
38	70919	HC053686		2
39		HC053687		2
40	70925	CC016477	CC016498	7
41	70929	ML214380		5
42	70938	CC016728		3
43	70941	HC054185	HC054205	2
44	70942	GM080621		1
45	70952	CC017076		2
46	70958	CC017487		8
47	70963	CC017698		10
48	70964	TR105961		2
49	70966	GM084916		1

50		GM084917		1
51		GM084918		1
52		GM084919		1
53		GM084920		1
54	70982	TS001926	CM086784	2
55			CM086785	2
56	70999	MH246704		1
57	71001	TR107011		2
58	71002	TR107012		2
59	71008	CC018887		6
60	71041	CC019429		7
61		CC019431		7
62	71049	TR108680		3
63	70054	CC019857	CC020015	8
64			CC020016	8
65	71063	CC019955		2
66	71074	CC020130		4
67	71084	TR109505		2
68	71094	CC020487		1
69	71096	HC058436		12
70		HC058437		12
71	71097	CC020513		2
72	71100	HC058595	CC020610	1
73	71111	MH255675	MH255741	5
74	71121	CC020850		1
75	71125	CC021009	CC021010	1
76	71126	CC021011		2
77		CC021012		2
78	71127	CC021016		2
79		CC020020		2
80	71128	MH256015		7
81	71129	MH256779		9
82	71132	GM01170		6
83	71133	MH214176		7
84	71139	GM105948		2
85	71140	GM106025		2
86	71141	GM257386		2
87	71144	MH257693		1
88	71147	CC021475		5
89		CC021477		5
90	71153	CC021703		2
91		CC021704		2
92	71159	CC021881		4
93		CC021882		4
94	71163	TR112697		2
95	71170	CC022092		10
96	71177	HC060282	CC022240	2
97	71182	CC022420		2
98	71197	CC022710		3
99	71198	CC022771		4
100		CC022712		4
101	71216	CC024354		8

102	71229	CC023553		10
103		CC023554		10
104	71242	CC023870		6
105	71261	CC024451	CC024520	3
106	71278	CC024673	TR116804	2
107	71281	CC024921		8
108	71283	CC024952		2
109	71284	CC024961		2
110	71285	CC024960		2
111	71291	TR117369		10
112	71297	CC025426		3
113	71298	CC025422		2
114		CC025424		2
115	71299	TR117701		2
116	71303	CC025493		2
117		CC025494		2
118	71312	CC025737	CC025802	6
119	71313	TR118133		2
120	71314	CC025784		2
121	71315	MH269340		8
122	71316	MH269341		1
123	71319	CC025493		1
124		CC025817		1
125	71329	CC025914		2
126	71333	MH269604		8
127	71334	TR118497		1
128	71335	GM129816		1
129	71358	HC064045	CC026001	3
130	71341	HC083860		3
131	71348	TR118806		2
132	71367	CC026327		8
133	71372	DC029914		1
134	71373	CC026408		7
135		CC026409		7
136	71380	MH271231		3
137	71386	MH271476		1
138	71387	CC026908		2
139	71388	CC026831		2
140	71389	CC026836		1
141	71403	GM133413		12
142	71408	HC065241	HC065315	4
143	71415	CC027760		19
144	71419	CC027812		18
145	71420	GM134982		18
146	71427	TR121326	TR121327	2
147	71429	MH274159		2
148		MH274160		13
149	71431	CC028177		2
150		CC028178		2
151	71435	MH274425	MH274502	1
152	71436	MH274426		12
153	71453	MH274871	MH274876	7

154	71462	TR122379		1
155	71469	TR122606		28
156	71472	TR122957	TR122952	25
157	71478	HC066990		13
158	71479	CC029539		7
159	71483	TR123237		2
160		TR123238		2
161	71485	CC029777		2
162		CC029778		2
163	71497	CC030486		9
164	71498	MH278084		13
165	71499	MH278058		8
166	71500	GM141293	MH271381	13
167	71501	MH278061		13
168	71502	GM141307		13
169	71505	MH278522		4
170	71516	CC030690		2
171		CC030691		2
172	71517	CC030741		1
173		CC030699		1
174	71518	CC030759		3
175		CC030762		3
176	71520	CC030690		7
177	71526	TS002655		1
178	71527	TS002659		1
179	71531	CC030945		6
180		CC030943		6
181	71532	GM143842		4
182	71537	CC031139		3
183	71547	ML286382		1
184	71548	ML286392		1
185	71552	TR126064		5
186	71561	TR123346		2
187		TR123347		2
188		TR123348		2
189		MH280989	MH280973	2
190	71588	GM149243		8
191	71596	MH282432		4
192	71597	TR127506		4
193	71598	TR127516		1
194	71602	CC033161		8
195	71604	TR127759		2
196	71612	CC033330		7
197	71618	TR128099		1
198	71629	GM152960		1
199	71632	CC033714		1
200	71638	CC033961		9
201	71641	TB000284		1
202	71644	TR128439	TB000299	1
203	71645	MH283853		1
204	71650	MH283999		4
205	71656	ML294427	CC034668	10

206		CC034420	CC034669	10
207	71658	CC034375		1
208	71667	CC034552		2
209	71668	MH284395		2
210	71672	NY000873	CC034621	2
211		CC034647	CC034661	2
212	71673	CC034646		1
213	71685	GM155858		2
214	71687	MH284835		1
215	71688	TB000729		1
216	71690	MH284790		1

CERTIFICATE OF SERVICE

I, T. Paul Taylor, certify that on November 8, 1999, I served a copy of the foregoing Reply Comments of RCN Telecom Services, Inc. Upon Application by Bell Atlantic - New York for Authorization to Provide In-Region, InterLATA Services in New York; CC Docket No. 99-295 upon the following individuals via the indicated methods:

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